

## **EXHIBIT 8**

SERGEY MAYOROV v.  
UNITED STATES OF AMERICA

JENIFER WALL  
June 6, 2014

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF ILLINOIS  
3                   EASTERN DIVISION  
4                   SERGEY MAYOROV,                   )  
5                   Plaintiff,                    )  
6                   vs.                                )  
7                   UNITED STATES OF AMERICA,    )  
8                   Defendant.                    )  
9  
10  
11  
12                   No. 13 CV 5249  
13                   Judge Rebecca R.  
14                   Pallmeyer

15                   The deposition of JENIFER WALL, taken  
16                   pursuant to the Federal Rules of Procedure, before  
17                   Melody A. Monk, Certified Shorthand Reporter No.  
18                   084-004772, at National Immigrant Justice Center,  
19                   208 South LaSalle Street, Suite 1300, Chicago,  
20                   Illinois, on Friday, June 6, 2014, commencing at  
21                   11:03 a.m. pursuant to notice.  
22  
23  
24

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1                   A P P E A R A N C E S  
2  
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1                   JENIFER WALL,  
2                   called as a witness herein, having been first duly  
3                   sworn, was examined and testified as follows:  
4                   EXAMINATION  
5                   BY MR. RAJADURAI:  
6                   Q. Good morning, Agent Wall. My name is  
7                   Abiman Rajadurai, and I represent a plaintiff in  
8                   this case. This is co-counsel, Mark Fleming.  
9                   Could you state your name and spell it  
10                  for the record?  
11                  A. Sure. It's Jenifer, J-E-N-I-F-E-R,  
12                  middle initial L., last name Wall, W-A-L-L.  
13                  Q. Have you ever been deposed before?  
14                  A. No.  
15                  Q. Okay. I'll just go through a basic  
16                  intro right now of the deposition process.  
17                  Basically it's a question-and-answer format. I'll  
18                  ask a question and have an answer. Your attorney  
19                  might object. Unless he tells you not to answer  
20                  specifically, you can go ahead and answer if you  
21                  understand the question.  
22                  If there's ever a point you don't  
23                  understand a question, just ask me to restate it or  
24                  clarify it. I'll try not to speak over you. Wait

<p style="text-align: right;">Page 5</p> <p>1 until I'm done with my question just so it's easier</p> <p>2 for the transcript. You have to answer verbally</p> <p>3 instead of head nods or hand gestures just so she</p> <p>4 can record the information. We can take a break</p> <p>5 whenever you'd like.</p> <p>6 Is there any, you know, medication or</p> <p>7 anything you're taking that might prevent you from</p> <p>8 testifying truthfully or completely today?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Okay. Did you review any documents to</p> <p>11 prepare for this document?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. And what documents were there?</p> <p>14 <b>A. It was the Stateville -- the list of</b></p> <p>15 <b>detainees that came through Stateville the day</b></p> <p>16 <b>Mr. Mayorov came through, and Mr. Morton's memo.</b></p> <p>17 Q. Okay. And did you happen to bring</p> <p>18 those with you today?</p> <p>19 <b>A. I did not, no.</b></p> <p>20 Q. And as far as you know, they've been</p> <p>21 produced in this litigation?</p> <p>22 <b>A. I am not sure.</b></p> <p>23 Q. Okay. That's fine.</p> <p>24 Did you discuss this case or deposition</p>	<p style="text-align: right;">Page 7</p> <p>1 <b>officer.</b></p> <p>2 Q. And what does CBP stand for?</p> <p>3 <b>A. Customs and Border Protection.</b></p> <p>4 Q. Okay. And when would you have received</p> <p>5 the Customs and Border Protection training?</p> <p>6 <b>A. I was hired in December 2003, so it</b></p> <p>7 <b>would have been in the beginning of 2004.</b></p> <p>8 Q. Okay. What year did you graduate</p> <p>9 college?</p> <p>10 <b>A. 2002.</b></p> <p>11 Q. Okay. And what was your first</p> <p>12 employment after graduating college?</p> <p>13 <b>A. It was during college.</b></p> <p>14 Q. I guess, when was your first employment</p> <p>15 after -- or if it continued on?</p> <p>16 <b>A. It continued.</b></p> <p>17 Q. Okay. And what was that position?</p> <p>18 <b>A. It was at a nonprofit organization.</b></p> <p>19 Q. And what was that called?</p> <p>20 <b>A. People, Inc.</b></p> <p>21 Q. Okay. And what was your title there?</p> <p>22 <b>A. I'm not sure. We did -- dealt with</b></p> <p>23 <b>developmentally disabled people --</b></p> <p>24 Q. Okay.</p>
<p style="text-align: right;">Page 6</p> <p>1 with anyone other than Mr. Kuhn?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Okay. Did you attend high school?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. What high school did you attend?</p> <p>6 <b>A. Niagra Wheatfield.</b></p> <p>7 Q. And did you graduate?</p> <p>8 <b>A. Yes, I did.</b></p> <p>9 Q. Did you attend college?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Where did you attend college?</p> <p>12 <b>A. The University at Buffalo.</b></p> <p>13 Q. And did you graduate from the</p> <p>14 University of Buffalo?</p> <p>15 <b>A. Yes, I did.</b></p> <p>16 Q. What was your degree in?</p> <p>17 <b>A. Political Science - Prelaw.</b></p> <p>18 Q. Okay. Any additional schooling?</p> <p>19 <b>A. Obviously the training for my current</b></p> <p>20 <b>position, yes.</b></p> <p>21 Q. Okay. Any other professional</p> <p>22 certifications that you studied for or earned?</p> <p>23 <b>A. My current position, immigration</b></p> <p>24 <b>enforcement agent. And then before that, CBP</b></p>	<p style="text-align: right;">Page 8</p> <p>1 <b>A. -- basically just interacting, working</b></p> <p>2 <b>with them, helping them perform --</b></p> <p>3 Q. Sure.</p> <p>4 <b>A. -- functions.</b></p> <p>5 Q. And what was your reason for leaving</p> <p>6 that position?</p> <p>7 <b>A. I was hired with Customers and Border</b></p> <p>8 <b>Protection.</b></p> <p>9 Q. Okay. And what year was that?</p> <p>10 <b>A. I was hired in December 2003.</b></p> <p>11 Q. And what was your title upon being</p> <p>12 hired there?</p> <p>13 <b>A. Customers and Border Protection</b></p> <p>14 <b>officer, CBPO.</b></p> <p>15 Q. Okay. And what were your job duties</p> <p>16 and responsibilities there?</p> <p>17 <b>A. I worked at a port of entry. So when</b></p> <p>18 <b>people would come into the United States, I'd have</b></p> <p>19 <b>to determine their -- whether they were a citizen,</b></p> <p>20 <b>interview them, determine whether they were able to</b></p> <p>21 <b>enter the United States, interview them to see if</b></p> <p>22 <b>possibly they had any contraband, do searches and</b></p> <p>23 <b>seizures, make arrests.</b></p> <p>24 Q. Okay. Were you involved with</p>

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1 interviewing individuals as part of determining  
2 their citizenship there?  
3 **A. Yes.**  
4 Q. Okay. Did you receive training on how  
5 to do that?  
6 **A. Yes.**  
7 Q. Where did you receive that training?  
8 **A. FLETC. It's in Glynco, Georgia.**  
9 Q. Okay. And do you remember who  
10 conducted the training?  
11 **A. No.**  
12 Q. Okay. Fair.  
13 And how long were you in that position?  
14 **A. I was -- from December of 2003 until**  
15 **June of 2006.**  
16 Q. Okay. And do you remember who you  
17 reported to?  
18 **A. There were various supervisors. It was**  
19 **shift work --**  
20 Q. Okay.  
21 **A. -- at the border. It's a 24-hour day**  
22 **operation. One of them would be Bulson,**  
23 **B-U-L-S-O-N.**  
24 Q. Okay.

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1 **A. He's a -- Warner was another one,**  
2 **W-A-R-N-E-R. Heinrich (phonetical) -- I'm not sure**  
3 **how to spell that -- he was on another shift.**  
4 Q. Sure.  
5 **A. So there was at least five supervisors.**  
6 Q. Okay. And what was your reason for  
7 leaving that position?  
8 **A. I took the position with ICE.**  
9 Q. Okay. And would that have been in  
10 June 2006 when you started with ICE?  
11 **A. That's correct.**  
12 Q. Okay. And what was your first title  
13 upon being hired by ICE?  
14 **A. Immigration enforcement agent.**  
15 Q. And is that your position today?  
16 **A. That's correct.**  
17 Q. Okay. And what are your job duties and  
18 responsibilities under -- as an IEA?  
19 **A. Basically we determine alienage and**  
20 **possible deport -- deportability of people we**  
21 **interview.**  
22 Q. Okay.  
23 **A. It also includes picking up people from**  
24 **jail, transporting, writing up their paperwork to**

Page 11

1 **go in front of the immigration judge, sometimes**  
2 **escorting the person back to their country.**  
3 Q. And where were you first -- what  
4 locations have you worked in as an IEA?  
5 **A. Both Broadview and the district office**  
6 **at 101 West Congress Parkway.**  
7 Q. Okay. And do you know what years  
8 you've been at either of those two?  
9 **A. No. We have a six-month rotation for**  
10 **the most part. Now it's a year, but for the most**  
11 **part every six months you'd be, you'd be bidding**  
12 **for where you wanted to be located.**  
13 Q. Okay. Were you ever located at  
14 Stateville Correctional Center?  
15 **A. Yes, I was.**  
16 Q. Okay. What years would you have been  
17 there?  
18 **A. I'd say off and on between 2008 and**  
19 **2012.**  
20 Q. Okay. Would that also be on a  
21 six-month cycle?  
22 **A. Yes.**  
23 Q. Okay. And during these six-month  
24 rotations, would your supervisor change, or would

Page 12

1 that stay constant?  
2 **A. Yes, my supervisor would change.**  
3 Q. Okay. Do you mind breaking that down  
4 by time, if you remember who your supervisors were?  
5 **A. In the beginning, I can't say from**  
6 **exactly what date to what date, Swazell**  
7 **(phonetical), Joseph Swazell was a supervisor, and**  
8 **he was directly above me. He was the SIEA. And**  
9 **then towards the end of that duration, it was**  
10 **Supervisor Wright, Sean Wright, S-E-A-N,**  
11 **W-R-I-G-H-T.**  
12 Q. Do you recall, when you were at  
13 Stateville, who your supervisor would have been?  
14 Would that --  
15 **A. That was the time I was at Stateville,**  
16 **both of those supervisors.**  
17 Q. Okay. Great.  
18 **A. Yes.**  
19 Q. And did you have anyone who reported to  
20 you while you worked as an IEA?  
21 **A. No, I'm the low person on the totem**  
22 **pole. No one reports to me.**  
23 Q. Okay. When you first started as a IEA,  
24 did you receive any training through a seminar or

Page 13

1 written materials?

2 **A. Yes. We went to FLETC for training --**

3 **well, I went to FLETC for training.**

4 Q. And that's in Glyncro, Georgia?

5 **A. That's correct.**

6 Q. And what, what subject matter was

7 covered at the training?

8 **A. The INA, the Immigration and**

9 **Nationality Act; detention standards; various**

10 **database checks.**

11 Q. Okay. Do you remember who conducted

12 that training?

13 **A. In the -- we switched teachers because**

14 **my teacher rotated out. My first teacher was Scot**

15 **Jackson. Scot, with one "T," Jackson.**

16 Q. And do you remember his title?

17 **A. No, I -- I'm not sure.**

18 Q. Okay. You currently are an IEA,

19 correct?

20 **A. That's correct.**

21 Q. And do you still report to Mr. Wright?

22 **A. No.**

23 Q. Who is your current supervisor?

24 **A. My current supervisor is not an SIEA;**

Page 14

1 **it's a SDDO, supervisory detention deportation**

2 **officer. His name is Podgorni, P-O-D-G-O-R-N-I.**

3 Q. As far as you know, what's the

4 difference between an SIEA and an SDDO?

5 **A. And SIEA, it's less pay, a lower grade.**

6 **SDDO is just a higher grade, higher title.**

7 Q. Okay. Do you know what an immigration

8 detainer is?

9 **A. I do.**

10 Q. What is an immigration detainer?

11 **A. It's -- if you look at a immigration**

12 **detainer, it's pretty straightforward of what it**

13 **is, if you read an immigration detainer.**

14 **I'd have to look at the particular**

15 **immigration detainer you're referring to because**

16 **there's different boxes you check off and it could**

17 **mean one of many things.**

18 Q. Okay. And did you receive training

19 regarding detainees when you started as an IEA?

20 **A. You mean when I came back to my office?**

21 Q. When you were hired as an IEA, did

22 you -- do you recall receiving training on how to

23 issue a detainer or --

24 **A. Yes.**

Page 15

1 Q. -- or investigate?

2 And what training did you receive?

3 **A. The training in Georgia covered placing**

4 **detainers.**

5 Q. Okay. Did you receive ongoing training

6 as you've been an IEA?

7 **A. Are you referring to detainees?**

8 Q. On detainees, yes.

9 **A. Not training, no.**

10 Q. Okay. Do you ever receive written

11 materials on updated policy or changes in policy?

12 **A. Yes.**

13 Q. How frequently would you say that

14 happens?

15 **A. I'd say maybe every six months you'll**

16 **get a different directive or different guidance.**

17 Q. And do you have the authority to issue

18 a detainer?

19 **A. I do, yes.**

20 Q. Okay. Do you follow a standard

21 procedure when deciding whether to issue a

22 detainer?

23 **A. For the most part, yes. Of course,**

24 **there's exceptions to any rule.**

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1 Q. Sure. Is there a documented procedure

2 of certain issues that you have to look into?

3 **A. No.**

4 Q. No?

5 **A. No.**

6 Q. What are, what are the items that you

7 look into when you're deciding whether to issue a

8 detainer?

9 **A. Alienage, first of all, whether the**

10 **person was born in the United States or whether**

11 **they possibly derived or -- derived citizenship or**

12 **naturalized. If a person's here illegally,**

13 **removability. If they are a resident, they're**

14 **still subject to the INA and they have to follow**

15 **the laws.**

16 Q. And do you prepare documents as you're

17 gathering and compiling all this information?

18 **A. You mean as I'm creating a detainer?**

19 Q. Yeah.

20 **A. Yes, I do.**

21 Q. Okay. What kind of documents do you

22 create?

23 **A. During our time at Stateville, each**

24 **thing is different. During our time at Stateville,**

Page 17

1 if we put a detainer on someone, we'd have a work  
2 folder on that person.  
3 Q. Okay. What were your job duties and  
4 responsibilities as an IEA at Stateville?  
5 A. At Stateville?  
6 Q. Yes.  
7 A. At Stateville, we talk to every single  
8 inmate coming through the prison, and then we talk  
9 to the person to see if we were interested in  
10 investigating their alienage and deportability.  
11 And also part of that would be going to the records  
12 office and placing detainers on certain  
13 individuals.  
14 Q. Okay. I guess I'll start with  
15 [Exhibit 1](#) from before. If you would just grab  
16 this.  
17 Have you seen this document before?  
18 A. This one?  
19 Q. Yes.  
20 A. The memo? Yes, I have.  
21 Q. What's your understanding of the memo?  
22 A. My understanding of the memo is that if  
23 somebody claims to be a United States citizen when  
24 they're in custody, that we are to consult our

Page 18

1 local OCC.  
2 Q. And do you know who that would have  
3 been, who you would have had to consult?  
4 A. OCC consists of several individuals.  
5 But, again, it's, it's stating if they're in ICE  
6 custody, which at Stateville the subject would not  
7 have been in ICE custody.  
8 Q. Okay. Did you ever receive any  
9 training on how to implement the policies in the  
10 memo?  
11 A. Training?  
12 Q. Yes.  
13 A. No.  
14 Q. Okay. And do you know how you would  
15 have received this document? Would this have been  
16 electronic or given to you at the facility?  
17 A. It would have been via e-mail more than  
18 likely.  
19 Q. Okay. And it's your understanding that  
20 if a directive comes out, that the policies therein  
21 should be followed when issuing a detainer?  
22 A. Yes, when issuing a detainer. But what  
23 you're referring to, it says claims by detained  
24 individuals.

Page 19

1 Q. Sure. And then I guess if we turn back  
2 to page 1, in the second paragraph there, there's a  
3 statement that says, towards the bottom of the  
4 second paragraph, As a matter of law, ICE cannot  
5 assert its civil immigration enforcement authority  
6 to arrest and/or detain a USC.  
7 Is that correct?  
8 A. That's correct.  
9 Q. And it's your understanding that that's  
10 the policy regarding all detainers that are  
11 possibly issued?  
12 A. No.  
13 Q. What was your -- what's your  
14 understanding of that statement?  
15 A. Which paragraph are you referring to?  
16 Q. The bottom of the second one, the  
17 statement that ICE cannot assert its enforcement  
18 authority to arrest or detain a U.S. citizen.  
19 A. Okay. I understand that, but if you're  
20 placing a detainer, sometimes you're still  
21 investigating whether the person is a citizen.  
22 Q. So it's possible to -- I guess going  
23 back, so are you saying it is possible that a  
24 detainer would be issued against a U.S. citizen?

Page 20

1 A. Yes, it's possible.  
2 Q. And in what case would that occur?  
3 A. Do you have a detainer available?  
4 MR. RAJADURAI: I can get one.  
5 MR. FLEMING: Sure. I can get one.  
6 MR. RAJADURAI: Sure. We can get one  
7 if you want.  
8 (Recess).  
9 ([Exhibit 4](#) marked).  
10 Q. All right. I guess we were discussing  
11 a detainer being issued against an individual even  
12 if they were a citizen.  
13 A. Okay. If you look at a detainer,  
14 there's a box checked that states an investigation  
15 has been initiated to determine whether this person  
16 is subject to removal from the United States.  
17 Q. Uh-huh.  
18 A. It's possible that somebody could be a  
19 citizen and use fraud or a misrepresentation to  
20 become a citizen, and sometimes we do discover that  
21 and we will still place a detainer against that  
22 individual --  
23 Q. And does it --  
24 A. -- upon further investigation, sorry.

Page 21

1 Q. Oh, sorry.  
2 Does a detainer request detention of  
3 the individual?  
4 A. Not necessarily. It states that we're  
5 investigating whether the person is subject to  
6 removal --  
7 Q. Okay.  
8 A. -- basically. I...  
9 Q. And as far as you know, are there  
10 different policies for when somebody would be  
11 detained, or would be subject to detention upon  
12 issuance of the detainer, or whether they wouldn't  
13 be detained during the investigation?  
14 A. I am not clear on your question.  
15 Q. Sure. Let me try to restate that.  
16 That was a lot right there.  
17 When this form is checked out, does  
18 that -- is there anything that indicates, or is  
19 there any policy that says the individual should  
20 be, you know, under detention since this box has  
21 been checked, or is there a -- is there really no  
22 policy about whether detention should occur or not?  
23 A. There really is no policy. We request  
24 that the person be turned over to us on one of the

Page 22

1 boxes on the detainer, but we do not make any  
2 requests to the jail, the prison, wherever the  
3 person may be, of how that person should be  
4 treated, I guess, or detained.  
5 Q. Okay. And do you know if this specific  
6 detainer required that Mr. Mayorov be detained?  
7 MR. KUHN: I'm going to object to the  
8 vagueness of the question. Be detained by who?  
9 IDOC or ICE?  
10 MR. RAJADURAI: IDOC.  
11 Q. Any special other detention by IDOC.  
12 A. A detainer does not request a person be  
13 detained. It asks for the person to be turned over  
14 to us at the end of their term with that particular  
15 agency if a certain box is checked. I mean,  
16 there's other boxes you could check: please cancel  
17 this detainer. I mean, there's a lot of different  
18 ways this can go. It's not really a clear  
19 question.  
20 Q. Okay. But the -- but this document  
21 would allow for the individual to be detained for  
22 an additional 48 hours?  
23 A. This particular detainer, it's  
24 requesting that the facility turn the subject over

Page 23

1 to us at the end of his sentence. So it's  
2 requesting that the subject be turned over to  
3 immigration. And as far as 48 hours, I've worked  
4 with the state and they do not hold people for 48  
5 hours. So it's a request.  
6 Q. Okay. And as far as you know, is it  
7 possible to derive U.S. citizenship through one's  
8 parents?  
9 A. Yes.  
10 Q. And are you familiar with the  
11 derivative citizenship available to a child through  
12 to the Child Citizenship Act of 2000?  
13 A. Yes, I am.  
14 Q. What's your understanding of that form  
15 of derivative citizenship?  
16 A. My understanding is -- I'd have to look  
17 at the act itself to see the dates, but if somebody  
18 is a child at the time that their parent becomes a  
19 citizen, that they derive citizenship through that  
20 parent. There are, there are stipulations of --  
21 the person has to -- that the person has to meet to  
22 become a citizen.  
23 Q. Okay. And do you take certain steps to  
24 investigate whether a subject inmate that you

Page 24

1 screen would have derived citizenship?  
2 A. Absolutely, yes.  
3 Q. What steps would those be?  
4 A. If -- now, each person -- each agent  
5 would have a different technique. Are you asking  
6 what I would do normally?  
7 Q. Well, I guess, let's start -- is there  
8 any general policy that all agents are required to  
9 follow when someone might be a potential derived  
10 citizen?  
11 A. No.  
12 Q. Okay. And what would you do in your  
13 practice?  
14 A. Normally, if I'm interviewing a  
15 subject, part of my routine questioning is asking  
16 about their parents and the parent's nationality.  
17 Unfortunately, in prison, a lot of people don't  
18 know what nationality their parents are or if they  
19 became citizens. If the subject claims that one of  
20 the parents are a citizen, we -- well, I always  
21 look further into it to see if they could possibly  
22 derive citizenship.  
23 Q. Okay. And how would you do that?  
24 A. It depends on the situation. Sometimes



Page 25

1 they say, my dad was born in the United States. So  
2 I'll get dad's phone number and call dad up and  
3 talk to dad. Other times, they say, my dad derived  
4 citizenship or my dad -- I'm sorry, my dad  
5 naturalized. In that case, I would be able to look  
6 up the date of his natural -- the father's  
7 naturalization.  
8 Q. Okay. And where would you look that  
9 up?  
10 A. In CIS.  
11 Q. And are you required to interview an  
12 inmate who you think might have derived  
13 citizenship?  
14 A. I'm not required to interview anyone.  
15 I have some leeway with that.  
16 Q. Okay. Well, how do you decide whether  
17 you should interview or not interview a subject?  
18 A. Your definition of interview, by --  
19 what is your definition of interview?  
20 Q. I guess meeting with the inmate and  
21 asking the questions about their citizenship.  
22 A. We -- as far as talking to an inmate,  
23 every single person that comes through the Illinois  
24 Department of Corrections we -- at Stateville, we

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1 talked to that day.  
2 Q. Okay. And are there specific questions  
3 you ask them specifically about their citizenship?  
4 A. No, nothing specific.  
5 Q. Okay. Do you know if someone who  
6 derived citizenship through the Child Citizenship  
7 Act needs to file paperwork or an application to be  
8 deemed a citizen?  
9 A. Yes. Eventually -- well, the person  
10 should file an N-600.  
11 Q. Okay. And if they haven't filed an  
12 N-600, are you aware of whether they are considered  
13 a citizen or not?  
14 A. For me, in my investigation, I'm going  
15 to -- I'm not -- if I believe someone may be a  
16 United States citizen, I'm not going to pursue --  
17 I'm not going to place a detainer at that point.  
18 I'm going to look into it further.  
19 Q. Okay. I guess my question is: Under  
20 the Child Citizenship Act, and your understanding  
21 of the act, would the individual need to file an  
22 N-600 to be considered a citizen?  
23 A. For my understanding, no.  
24 Q. Okay. Do you, do you take any

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1 additional steps or other steps when you have met a  
2 individual claiming derived citizenship through  
3 this act but haven't filed that N-600?  
4 A. Normally I just advise the person to  
5 file an N-600. That's about all. I -- if somebody  
6 claims that they derived, and if I believe that  
7 subject's claim, that's the only action I would  
8 take.  
9 Q. Okay. I know you rotate facilities.  
10 How many times have you been rotated through  
11 Stateville?  
12 A. I'd say three.  
13 Q. Okay. And do you know roughly what  
14 time periods those were?  
15 A. Between 2007 and 2012, I'd say.  
16 Q. And they're always six months at a  
17 time?  
18 A. Not necessarily, not necessarily.  
19 Sometimes you'll fill in for somebody. But if  
20 you're stationed out there, it would be for a  
21 six-month time frame.  
22 Q. Okay. And did you choose to be  
23 assigned to Stateville, or are you assigned there?  
24 A. I chose to be assigned there.

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1 Q. Okay. How many ICE agents typically  
2 are at Stateville, you know, during these various  
3 three periods?  
4 A. Usually there's three agents assigned.  
5 However, if somebody calls in sick or somebody has  
6 vacation, it could be two.  
7 Q. Okay. And are you all IEAs, or are  
8 there other different titles for those individuals?  
9 A. For the most part, we all are IEA, but  
10 sometimes the deportation officer will even fill  
11 in. But the people actually assigned to Stateville  
12 are all IEAs.  
13 Q. Okay. And you're re -- the person  
14 you'd report to there would be either Swazell or  
15 Wright during that time period?  
16 A. Yes, during that time period.  
17 Q. Okay. I guess we'll start with what  
18 was [Exhibit 2](#), this document here.  
19 Do you recognize this document?  
20 A. Yes, I do.  
21 Q. Okay. What is this?  
22 A. It's the NRC Intake Property Inventory  
23 Record. It's a state document. It's not our  
24 document.



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1 Q. Okay. And as far as you know, does  
2 this reflect that all of the inmates have to be  
3 processed by ICE or go through ICE processing?  
4 A. I wouldn't say process, but they all  
5 have to speak to ICE, yes.  
6 Q. Okay. Is there ever a case you  
7 remember where someone didn't have to go through  
8 ICE as part of this process?  
9 A. Sometimes, with time constraints,  
10 they'll skip ICE on a particular day. Normally,  
11 they will have to report to us the following day.  
12 But for the most part, in order for them to get  
13 cleared, they have to speak to us, yes.  
14 Q. And do you see this document? It's not  
15 color, but it's highlighted over ICE. Is that  
16 something you're required to do after seeing an  
17 inmate?  
18 A. It's, it's not a requirement, but it  
19 was just part of our everyday activity at  
20 Stateville saying that we had talked to that  
21 person.  
22 Q. Okay. Any other notes you had to make  
23 about an individual that they had been seen by ICE?  
24 A. If we placed a detainer on that date,

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1 we would write detainer next to ICE.  
2 Q. Okay. Have you processed inmates for  
3 ICE, you know, ever since you arrived at  
4 Stateville, or did that start at a later date?  
5 A. I'm not -- what do you mean by  
6 processed?  
7 Q. Sure. Let me -- I guess through the  
8 screening process when inmates come in, has that  
9 been part of your job duties since you started day  
10 one at Stateville, or did you start doing that at a  
11 later date?  
12 A. Pretty much day one at Stateville,  
13 that's the process.  
14 Q. Sure.  
15 A. You talk to everybody.  
16 Q. Did you receive any training upon  
17 moving to Stateville on how to screen an inmate?  
18 A. Not official training, just from the  
19 previous agents that were stationed out there.  
20 Q. Okay. Was there anyone you shadowed or  
21 followed to see how a screening process worked?  
22 A. Yeah -- yes. I'd say Immigration  
23 Enforcement Agent Rivera, who is now a DO.  
24 Q. Okay. And how long did you shadow

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1 Mr. Rivera?  
2 A. To be honest, I'm not sure.  
3 Q. Okay. Any other ongoing training other  
4 than the directives that we've seen or example we  
5 showed you?  
6 A. We have video classes we'll take on  
7 various subjects, not necessarily on detainers.  
8 Q. Okay.  
9 A. But...  
10 Q. On average, how many inmates would you  
11 screen per day?  
12 A. It could vary anywhere between -- on  
13 the low number, I'd say 50; on the high end, I'd  
14 say 300.  
15 Q. And are you alone during these  
16 interviews, or is it usually with another agent?  
17 A. That depends on our staffing for the  
18 particular day --  
19 Q. Okay.  
20 A. -- and how busy we are.  
21 Q. Typically, what would you say for a day  
22 of 50 versus a day of 250?  
23 A. On a day of 50, you might have two  
24 agents in the room interviewing a subject and you

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1 might only have -- normally it was only one person  
2 in the hall, the -- depending on the day.  
3 Q. Okay. And were there standard  
4 questions or an operating procedure that you  
5 followed for screening the individuals?  
6 A. No.  
7 Q. Okay. Did you kind of create your own  
8 script or list of questions that you would go  
9 through?  
10 A. No, it would depend on the day what I'd  
11 ask the person.  
12 Q. Okay. And what information would you  
13 seek on a -- you know, you mentioned you changed  
14 the information. What -- generally, what  
15 information would you seek?  
16 A. Sometimes I just try to make  
17 conversation with the subject to see if they had  
18 any sort of an accent. Other times, I'd -- if I  
19 was more suspicious that the person wasn't from  
20 Chicago or the United States or -- I'd ask them  
21 additional questions. But that would, that would  
22 vary depending on the person and...  
23 Q. And then are you required to ask  
24 specific questions to determine if someone's a

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1 United States citizen?

2 A. No.

3 Q. Okay.

4 A. No.

5 Q. Are you required to document that you

6 asked about citizenship, or the answer that you

7 received?

8 A. No.

9 Q. Okay. What would you say ICE's

10 objectives are during this screening process?

11 A. This would be my understanding. It

12 wouldn't be ICE's mission, I'd say. But for the

13 most part, we're looking for violent individuals

14 that -- violent or people that may be a threat to

15 society that may be removable from the United

16 States that we want to investigate.

17 Q. Okay. And did you ever take notes

18 about the individuals that you screened or write

19 down information about them in any sort of report?

20 A. Yes.

21 Q. What kind of documents are these?

22 A. We do a scratch 213.

23 Q. Was that scratch?

24 A. Scratch, like -- a 213 normally is done

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1 on computer. We'd write it by hand.

2 Q. Okay. And are those records kept

3 anywhere, as far as you know?

4 A. With each detainer, most of the time

5 there's a scratch 213, yes.

6 Q. As far as you know, if a detainer was

7 issued then against Mr. Mayorov, the plaintiff in

8 this case, would there be a scratch 213 for him?

9 A. If it was done at Stateville, there

10 should be, yes.

11 Q. Okay. If you determine an individual's

12 removable from the United States through your

13 interview or screening, what would you do next?

14 A. If the subject is removable --

15 Q. Yes.

16 A. -- from the United States, then I would

17 place a detainer on the subject.

18 Q. Okay. Do you input the data into any

19 other system or record it anywhere else?

20 A. Yes. It's -- at that time, it was

21 called ENFORCE.

22 Q. Okay. Could you describe that

23 database?

24 A. I don't know if I'm allowed to.

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1 Q. All right.

2 MR. KUHN: Just tell him the general

3 purpose.

4 THE WITNESS: Okay.

5 MR. RAJADURAI: Sure, just general.

6 A. It would just have basic biographical

7 information on the subject, and it would also

8 record that we placed a detainer on the subject.

9 Q. Okay. If you determine that an

10 individual is a United States citizen, what

11 procedure do you follow after that, or what steps

12 do you take?

13 A. We're in the enforcement part of the

14 house. If somebody is a USC -- if we think that

15 the person is a United States citizen, we're not

16 keeping any information on that person.

17 Q. Okay. Did you ever encounter a case

18 where an individual was determined to be a United

19 States citizen but had an ENFORCE database entry

20 with their name?

21 A. It's possible, yes.

22 Q. What situations would that occur in?

23 A. Usually if somebody does a -- an

24 investigation on that person where they look into

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1 that person with a little bit more than, you know,

2 a 30-second conversation, that they're actually

3 requesting the A File, requesting the parents' A

4 Files, they -- they'll write a report on it in

5 ENFORCE.

6 Q. Okay. And would you ever request an A

7 File on a -- on an inmate that you interviewed?

8 A. Yes, I would.

9 Q. Okay. Under what circumstance would

10 you request the A File?

11 A. Usually if I did not believe what the

12 person said, I would request the A File to see what

13 was inside the A File.

14 Q. And how quickly would you receive that

15 A File?

16 A. Anywhere from two to four weeks.

17 Q. And would you -- were there cases where

18 you would also look into the A File of an

19 individual's parents?

20 A. Absolutely, yes.

21 Q. And would you follow the same procedure

22 of requesting the parents' A File?

23 A. Again, on those cases where I did -- I,

24 I had questions, I, I would look into the parents',

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1     **yes.**  
2     Q.   And I think you said, and let me know  
3     if this is incorrect, that you're allowed to update  
4     the ENFORCE database?  
5     A.   **Yes, you --**  
6     Q.   Okay.  
7     A.   **We are able to update ENFORCE.**  
8     Q.   Okay. And would you --  
9     A.   **But ENFORCE is not CIS. I just want to**  
10    **make that clear.**  
11    Q.   Oh, yeah. No problem.  
12       And then are you required to update an  
13    ENFORCE entry if it doesn't reflect that somebody  
14    is a U.S. citizen and you have determined they are  
15    a U.S. citizen?  
16    A.   **No. Nothing's in writing about doing**  
17    **it, no.**  
18    Q.   Okay. Do you know whose responsibility  
19    that would be?  
20    A.   **As far -- I mean, if you're -- found**  
21    **somebody to be a citizen, for me, I would update**  
22    **it, but nothing's in writing that it has to be**  
23    **done.**  
24    Q.   Okay. Would there ever be cases where

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1     you reported up to anyone to update the ENFORCE  
2     database?  
3     A.   **For me, I always enter my own**  
4     **information. As far as passing on information,**  
5     **it's not something I do, no.**  
6     Q.   And do you know how long it would take  
7     to update the ENFORCE database to reflect that  
8     someone was a U.S. citizen?  
9     A.   **As far as I know, it's pretty much as**  
10    **soon as you hit save, it's updated.**  
11    Q.   Okay. And I know you've mentioned some  
12    other databases like CIS. Do you know how long it  
13    would take to update any of those systems to  
14    reflect a citizenship status change?  
15    A.   **I have no idea.**  
16    Q.   Okay. Are you familiar with Secure  
17    Communities Processing Center?  
18    A.   **Yes.**  
19    Q.   What is that?  
20    A.   **I don't know if I could really define**  
21    **Secure Communities. It's one of the sections we**  
22    **rotate into, and they have -- it's a 24-hour**  
23    **center. Sometimes it -- people call in, sometimes**  
24    **they get biometric hits.**

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1     Q.   Okay. And what's a biometric hit?  
2     A.   **A biometric hit is when somebody's**  
3     **fingerprints are in and there's a match with our**  
4     **system to the fingerprints that are ran when**  
5     **they're arrested.**  
6     Q.   Were you aware that Secure Communities  
7     Processing Center reviews the records of inmates  
8     screened at Stateville?  
9     A.   **I know they -- that they have in the**  
10    **past.**  
11    Q.   Okay.  
12    A.   **I -- yes, I'm aware of that.**  
13    Q.   When did you first become aware of  
14    that?  
15    A.   **I became aware of it because**  
16    **occasionally I would get a, a e-mail or a call from**  
17    **an agent in Secure Communities asking if I**  
18    **interviewed a particular inmate.**  
19    Q.   Sure. And so you're, you're aware that  
20    they review records of inmates screened by the ICE  
21    agents at Stateville?  
22    A.   **They don't review records of the ICE**  
23    **agents, no.**  
24    Q.   Or, no, of the inmates that you've

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1     screened.  
2     A.   **It's possible.**  
3     Q.   Okay. And do you know if they review  
4     all the records of the inmates screened by the ICE  
5     agents?  
6     A.   **No, I am not sure.**  
7     Q.   Do you know how they make that  
8     decision, of which inmate's records to review that  
9     you've processed?  
10    A.   **I believe, and this is what I'm not a**  
11    **hundred percent sure, but I believe it would be**  
12    **through the biometric hits.**  
13    Q.   Okay. Do you ever run any other sort  
14    of background checks on the inmates other than the  
15    electronic systems you've mentioned here already?  
16    A.   **Other than interviewing and electronic**  
17    **checks and maybe calling family members, no.**  
18    Q.   Do you ever look into any other  
19    hard-copy records other than the A File?  
20    A.   **I, I don't get what you're asking,**  
21    **Maybe a birth certificate? I -- stuff like that.**  
22    Q.   Sure. And when would you make that  
23    request?  
24    A.   **If somebody claimed that they were born**

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1 in Cook County, I may try to get their Cook County  
2 birth certificate.  
3 Q. Okay. Is there any, you know, protocol  
4 that you have or that you're required to follow  
5 requiring further investigation to a certain inmate  
6 as opposed to another inmate?  
7 A. No.  
8 Q. So your protocols are roughly the same  
9 for all the inmates that you'd see?  
10 A. What do you mean by protocol?  
11 Q. The questions that you ask, is there,  
12 is there ever a point or any sort of triggers that  
13 require further investigation into someone else  
14 rather than one inmate versus another?  
15 A. Well, yes, if somebody -- like I said,  
16 if they have an accent, if they say they were born  
17 somewhere else. There's different factors that  
18 come into play as far as how many questions I'm  
19 going to ask someone.  
20 Q. Okay. And then in your experience,  
21 were there cases where you had to discuss an  
22 inmate's status with another ICE agent onsite or  
23 one of your supervisors offsite?  
24 A. Yes.

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1 Q. And what cases would those be?  
2 A. Sometimes we'd have two individuals  
3 using the same identity and we'd have to ask a  
4 supervisor about placing a detainer on that subject  
5 because one person would be a citizen and the other  
6 person wouldn't. Sometimes with the, the  
7 naturalization charts -- it's very confusing  
8 because there's so many dates -- you'd have to  
9 ask -- you'd go to another agent you trusted to  
10 say, is it possible this person is a citizen. So,  
11 I mean, there are plenty of times that you do  
12 consult with other agents.  
13 Q. Okay. Do you ever take any sworn  
14 statements or record statements of an inmate in any  
15 way?  
16 A. Yes, I do take sworn statements on  
17 occasion.  
18 Q. Why would you do that?  
19 A. The majority of the time we take a  
20 sworn statement, it's on somebody that's been  
21 deported previously --  
22 Q. Okay.  
23 A. -- or removed previously.  
24 Q. Is there any requirement that you have

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1 to take a sworn statement or a recorded statement  
2 for an interview?  
3 A. No.  
4 Q. Okay. Are those records kept somewhere  
5 if you do document them?  
6 A. If we have taken a sworn statement, it  
7 should be included in the A File.  
8 Q. Okay. And it's our understanding that  
9 there's some sort of log that you keep each day, is  
10 that correct, that you summarize kind of the daily  
11 report of inmates that you've seen?  
12 A. That's correct.  
13 Q. And would you prepare that, or is that  
14 a group effort?  
15 A. It would be -- we'd switch off. It  
16 wouldn't be one particular person's responsibility.  
17 But during different time frames, you know, one  
18 person may be responsible of the three of you.  
19 Q. And what information is kept on that  
20 log?  
21 A. There were different logs. One log  
22 would be every person that we talked to that day  
23 and their inmate numbers. Another log would be  
24 people we placed detainees against.

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1 Q. Okay. Do you know if there's an  
2 item -- a line item for someone's citizenship  
3 status on either of those logs?  
4 A. I believe there was, yes.  
5 Q. Okay. And then who would you send that  
6 report to?  
7 A. I'd send it to my SDDO, I believe, at  
8 that time, which was not my -- yeah, my supervisor  
9 would be copied.  
10 Q. Okay. And is that an electronic record  
11 or is that a hard copy?  
12 A. It would be electronic.  
13 Q. Okay. Are there any other records that  
14 you would keep from a screening interview other  
15 than this log and then the scratch 213 you  
16 mentioned before?  
17 A. We'd keep CIS claims. Whatever we ran  
18 that day on -- specifically on people that we  
19 placed detainees on.  
20 Q. Okay. And would that -- would include  
21 if you ran a system check on their parent also?  
22 A. Yes, that would be in with the  
23 paperwork with the detainer, if we ran the parent  
24 that day.

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<p>1 Q. Okay. Would you keep a scratch 213 or 2 any other records if you didn't issue a detainer? 3 A. No. 4 Q. Okay. Do you know if ICE uses any 5 outside companies to conduct its screenings? 6 A. Do you mean at Stateville? 7 Q. Yes. 8 A. No, it was always ICE staff at 9 Stateville. 10 Q. As, as far as you know, there were no 11 other contractors or third parties? 12 A. At Stateville, no. 13 Q. Okay. Do you know what the Impact 14 Incarceration Program or Boot Camp is at 15 Stateville? 16 A. I'm aware of the Boot Camp at 17 Stateville. I'm not fully knowledgeable of what, 18 what the process is or what they do there. 19 Q. What's your level of involvement with 20 the program? 21 A. With the Boot Camp program? 22 Q. Yes. 23 A. I don't have any involvement. I'm a 24 federal employee. That's a state program.</p>	<p>1 Oh, here it is. 2 A. No, it's still up here. 3 Q. We can move into this document if you 4 want. 5 A. Okay. 6 Q. Exhibit 3, it's on the second-to-last 7 page here. 8 You recognize this document? 9 A. Yes, I do. 10 It states that the individual here is 11 going to Boot Camp on this page. 12 Q. And if it includes that information, is 13 there any change in how you screen an inmate or 14 what questions you might ask? 15 A. As far as whether they're going to Boot 16 Camp or not, no, it's the same, same line -- same 17 questioning for each person coming through. 18 Q. Okay. 19 A. Like I said, I mean, there's no 20 specific questions we ask, but... 21 Q. Okay. And were you ever aware that 22 Mr. Mayorov, the plaintiff in this case, was to be 23 part of the Boot Camp program? 24 A. I don't remember speaking to the</p>
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<p>1 Q. Sure. Are you aware of any of the 2 eligibility requirements for the program? 3 A. No, not -- I, I don't know what makes a 4 person eligible, no. 5 Q. Okay. Do you know then, you know, what 6 effect an immigration detainer would have on 7 eligibility? 8 A. I am aware that if somebody did have a 9 detainer, that they may be pulled out of Boot Camp 10 or may not be eligible. 11 Q. Okay. Are you aware of any individual 12 who was participated to permit to participate in 13 the program with an immigration detainer lodged 14 against him or her? 15 A. I don't have any knowledge of that. 16 Q. Okay. Do you have -- do you ever 17 receive any information about whether an inmate is 18 to participate in the program when you're screening 19 them? 20 A. Yes. If you refer to -- oh, I don't 21 think you introduced that. 22 MR. KUHN: Sure. 23 MR. RAJADURAI: We can -- 24 MR. KUHN: You can pull it out here.</p>	<p>1 subject, so I'm not aware that he was part of Boot 2 Camp, no. 3 Q. Do you ever recall speaking to any 4 other agents, including Agent Reynoso, about 5 Mr. Mayorov? 6 A. The only time I spoke to her was when I 7 was told that there was a lawsuit and we just 8 looked back to see if we had any information -- 9 Q. Okay. 10 A. -- at that time. 11 Q. And do you know what records you looked 12 to? 13 A. We did find the -- this sheet here and 14 we did provide that sheet. That was all we had. 15 Q. Okay. In looking at that sheet, do you 16 recognize the handwriting on that? 17 A. Yes. 18 Q. Whose handwriting is that? 19 A. It's Mayra's. 20 Q. Okay. Do you see where it says USC? 21 A. Child of a USC? 22 Q. Yes. 23 A. Yes. 24 Q. And what does that stand for?</p>

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1     **A. Basically, on that date she's notating**  
2     **that she chose not to place a detainer on that**  
3     **subject; that that subject may have derived**  
4     **citizenship. But she's not saying he is a USC;**  
5     **she's saying he's a child of a United States**  
6     **citizen.**  
7     Q. Okay. And do you know who else would  
8     receive this sheet other than the ICE agents?  
9     **A. I'm not positive. In -- at one point**  
10    **they were being scanned in to the supervisor, but**  
11    **I'm not positive if it was during this time frame.**  
12    Q. Okay. And then if, if, if there is a  
13    notation there of child of a U.S. citizen, are you  
14    required to update that information or to inform  
15    anyone else that you might have a potential claim  
16    for citizenship?  
17    **A. No.**  
18    Q. Okay. And as far as you know, do you  
19    know where Agent Reynoso would have got the  
20    information that Mr. Mayorov was a child of a U.S.  
21    citizen?  
22    **A. By talking to him.**  
23    Q. Okay. Were you aware that -- and --  
24    that Mr. Mayorov was to be part of the Boot Camp

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1    Program?  
2    **A. I do not remember ever talking to him.**  
3    Q. Sure. Were, were you aware that the  
4    Secure Communities Processing Center reviewed his  
5    records after he was processed at Stateville?  
6    **A. Like I said, I wasn't aware of who they**  
7    **reviewed or what was reviewed.**  
8    Q. Okay.  
9    **A. I know things were reviewed because I**  
10   **receive e-mails saying, hey, did you talk to this**  
11   **person or that person. But other than that, I'm**  
12   **not aware that this subject was reviewed by Secure**  
13   **Communities.**  
14    Q. And do you happen to remember who would  
15    have sent those e-mails to you?  
16    **A. The particular agent, if he or she**  
17   **chose to investigate something further, they may**  
18   **have sent an e-mail to me that day.**  
19    Q. Okay. Were you --  
20    **A. It's various agents.**  
21    Q. Okay. Were you aware that Secure  
22    Communities eventually did issue an immigration  
23    detainer against Mr. Mayorov?  
24    **A. Not until today.**

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1     Q. Okay. All right. Were there occasions  
2     when you interviewed an individual during screening  
3     that you had this -- had an issue arise that you  
4     had to speak to a supervisor?  
5     **A. Yes.**  
6     Q. What issues would those be?  
7     **A. Most of the time it would be involving**  
8     **citizenship, whether we should place a detainer,**  
9     **hold off on placing a detainer. Anything**  
10    **that would -- a lot of gray areas, you do -- you'd**  
11    **contact a supervisor and say, I need your input on**  
12    **this, what do you think.**  
13    Q. Okay. I guess turning back to  
14    [Exhibit 3](#), the, the second-to-last page of that  
15    document, do you know why Agent Reynoso would write  
16    that Mr. Mayorov was a child of a United States  
17    citizen?  
18    **A. She, she would write that if he was not**  
19    **born in the United States and she -- I'm assuming**  
20    **she wrote it from her interview.**  
21    Q. Okay.  
22    **A. I, I don't know.**  
23    Q. I mean, do you know if this  
24    information -- I think -- you know, you might have

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1     answered this before. If this information is not  
2     available to other agents, is there any reason to  
3     write that down?  
4     **A. Yes, there is a reason to write it**  
5     **down, because there are two separate sheets we'd**  
6     **submit. One was for people born in the United**  
7     **States. One was for people not born in the United**  
8     **States.**  
9     Q. Okay.  
10    **A. She would have wrote that down**  
11    **explaining why she didn't take action against him.**  
12    Q. Okay. So would you say she's required  
13    to put that down?  
14    **A. No. We're not required, no.**  
15    Q. Okay. And then would, would this  
16    document and the information there ever be  
17    incorporated into ENFORCE?  
18    **A. Not by me. Not by, not by me, no.**  
19    Q. Do you know who might be responsible  
20    for that?  
21    **A. Again, ENFORCE is -- it's an**  
22    **enforcement tool. As far as putting information in**  
23    **ENFORCE, if you didn't take action against that**  
24    **individual, the majority of the time you wouldn't**



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1 put that information in.

2 Q. Okay. Are you aware of any Stateville

3 inmates that you processed that received an

4 immigration detainer but then were later determined

5 to be U.S. citizens?

6 A. Yes.

7 Q. And how, how, how many would you say

8 you encountered in your time there?

9 A. Maybe -- in the whole duration, maybe

10 three or four individuals.

11 Q. And if you could, could you develop how

12 those cases unfold?

13 A. A lot of times the people in prison,

14 they're not a -- very involved with their parents.

15 They don't know that they're citizens. So at the

16 time we talk to them, they tell us they were born

17 in Mexico, their parents are from Mexico, and they

18 don't realize, oh, my dad became a citizen or my

19 mom became a citizen.

20 So it's very possible that they may

21 have found out after they talked to us. And

22 whenever they'd come back and talk to us or they'd

23 send us letters, we'd look into it and lift the,

24 the detainer if we found them to be a citizen.

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1 Q. And in any of those cases, do you

2 remember if the individual was participating in the

3 Boot Camp program, Impact Incarceration program?

4 A. In those cases that I placed a detainer

5 on somebody?

6 Q. The cases where it was later determined

7 that they had a U.S. -- they were U.S. citizens.

8 A. That I -- no, none of my cases.

9 Q. Okay. Any other cases that didn't

10 involve you?

11 A. Not that I'm aware of, no.

12 MR. RAJADURAI: Okay. I think that's

13 all I have.

14 MR. FLEMING: That's all.

15 MR. KUHN: I don't have anything.

16 We'll reserve signature. I'll take a copy of

17 whatever.

18 THE REPORTER: Do you want to order?

19 MR. RAJADURAI: Yes.

20 (Deposition concluded).

21

22

23

24

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE NORTHERN DISTRICT OF ILLINOIS

3 EASTERN DIVISION

4 SERGEY MAYOROV )

5 Plaintiff, )

6 vs. ) No. 13 CV 5249

7 UNITED STATES OF AMERICA, ) Judge Rebecca R.

8 Defendant. ) Pallmeyer

9

10 This is to certify that I have read my

11 deposition taken on June 6, 2014, in the foregoing

12 cause, and that the foregoing transcript accurately

13 states the questions asked and the answers given by

14 me, with the changes or corrections, if any, made

15 on the Errata Sheet attached hereto.

16

17 JENIFER WALL

18

19 No errata sheets submitted (Please initial)

20 Number of errata sheets submitted pages

21 Subscribed and sworn to

22 before me this day

23 of 2014.

24 Notary Public

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1 STATE OF ILLINOIS } SS:

2 COUNTY OF C O O K }

3

4 I, Melody A. Monk, do hereby certify

5 that JENIFER WALL was duly sworn by me to testify

6 the whole truth, that the foregoing deposition was

7 recorded stenographically by me and was reduced to

8 computerized transcript under my direction, and

9 that said deposition constitutes a true record of

10 the testimony given by said witness.

11

12 I further certify that the reading and

13 signing of the deposition was not waived, and the

14 deposition was submitted to James M. Kuhn, Sr.,

15 defendant's counsel, for signature. Pursuant to

16 Rule 30(e) of the Federal Rules of Procedure, if

17 deponent does not appear or read and sign the

18 deposition within 30 days, the deposition may be

19 used as fully as though signed, and this

20 certificate will then evidence such failure to

21 appear as the reason for signature not being

22 obtained.

23

24 I further certify that I am not a

relative or employee or attorney or counsel of any

of the parties, or a relative or employee of such

attorney or counsel, or financially interested

directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set

my hand and affixed my seal of office at Chicago,

Illinois, this 14th day of June 2014.

Illinois CSR No. 084.004772

Melody A. Monk, RPR

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